

EXHIBIT 1

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

GOOGLE LLC,

Plaintiff

v.

SONOS, INC.,

Defendant.

CASE NO. 3:20-cv-06754-WHA
Related to CASE NO. 3:21-cv-07559-WHA

**OPENING EXPERT REPORT OF DR. DAN SCHONFELD REGARDING U.S. PATENT
NO. 10,848,885 AND U.S. PATENT NO. 10,469,966**

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[REDACTED]

[REDACTED]

[REDACTED]

Sonos Forums and/or Nourse rendered obvious the ability to have one speaker in two zone scenes at the same time, as did the Logitech System in combination with Nourse.

108. I understand the Court also found that the specification *does* disclose “that an individual smart speaker that has been added to a speaker group will continue to operate individually – *i.e.*, in ‘standalone mode’ – until the speaker group of which it is a member is activated by the user, at which point the individual speaker will transition to be controlled as part of the group.” Dkt. 309 at 15. I further understand that with respect to the term “standalone mode,” it is sufficient for the specification to disclose “that the process of forming a zone scene occurs in a specific order,” where the scene is saved and “invoke[d]” later, regardless of the particular behavior of the zone player after the zone scene has been saved and before it has been invoked. I understand that this discloses that zone players can play “synchronously” if grouped together, or “individually if the players are disassociated with each other.” Dkt. 30 at 16. [REDACTED]

[REDACTED]

Sonos Forums and/or Nourse rendered the ability to have a player continue playing in standalone mode obvious, as did the Logitech System in combination with Nourse.

109. The Court’s findings with respect to written description provide additional support for my invalidity opinions. This is because the extent to which a feature must be described and disclosed in the ’885 and ’966 patents also informs the extent to which a feature must be described and disclosed in the prior art to anticipate and/or render the claim obvious.

110. With respect to the claim requirement that zone players may be joined to multiple “zone scenes,” the Court’s Order noted that in relation to Fig. 5B, reproduced below, it is sufficient

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I, Dan Schonfeld, declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

A handwritten signature in black ink that reads "Dan Schonfeld". The signature is written in a cursive style, with the first name "Dan" and last name "Schonfeld" clearly legible. The signature ends with a large, circular flourish.

DATED: November 30, 2022

Dan Schonfeld, Ph.D